



July 23, 2019

Chairman Ajit Pai
Commissioner Mike O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Commissioner Geoffrey Starks
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* in WC Docket No. 17-310

Dear Chairman and Commissioners:

I am writing to you on behalf of the Southern Ohio Health Care Network (SOHCN) to request that the introduction of the recent proposed Order reforming the Rural Health Care program at the Commission meeting on August 1, 2019 be delayed.

While we appreciate the effort put into the draft, we believe the Order as currently written would have significant unintended consequences that are not in alignment with the intent of the RHC program. The requested delay is to allow for time to analyze the impact of the draft Order and discuss refinements with the pertinent FCC staff.

Attached to this letter is a set of seven slides that explain one of the primary issues of concern to the SOHCN, i.e. the definition of rurality. While we support the tiered approach, the current definitions would disadvantage many health care providers operating within small towns surrounded by large rural areas which they serve. During calls with other SHLB members, we have found broad support for the position articulated in the attached slide deck.

You are also in receipt of a more expansive letter from the SHLB coalition asking for a similar delay and providing more specific information on concerns that could be discerned in the short time that the proposed Order has been available to the public.

I would be glad to speak with you about this request on behalf of SOHCN if you wish.

A handwritten signature in black ink, appearing to read "T. Reid". The signature is fluid and cursive, with a large, stylized "T" and "R".

Tom Reid
Project Coordinator
Tom@SOHCN.org
740-590-0076

Cc: Preston Wise, Joseph Calascione, Arielle Roth, Travis Litman, Randy Clarke, Trent Harkrader

Attachment: SHLB Rurality Issues by SOHCN 23 July 2019



Unintended Consequences

The Definition of “Rurality” in the FCC Healthcare Connect Fund

23 July 2019

Tom Reid

Project Coordinator – Board Appointed

Tom@SOHCN.org

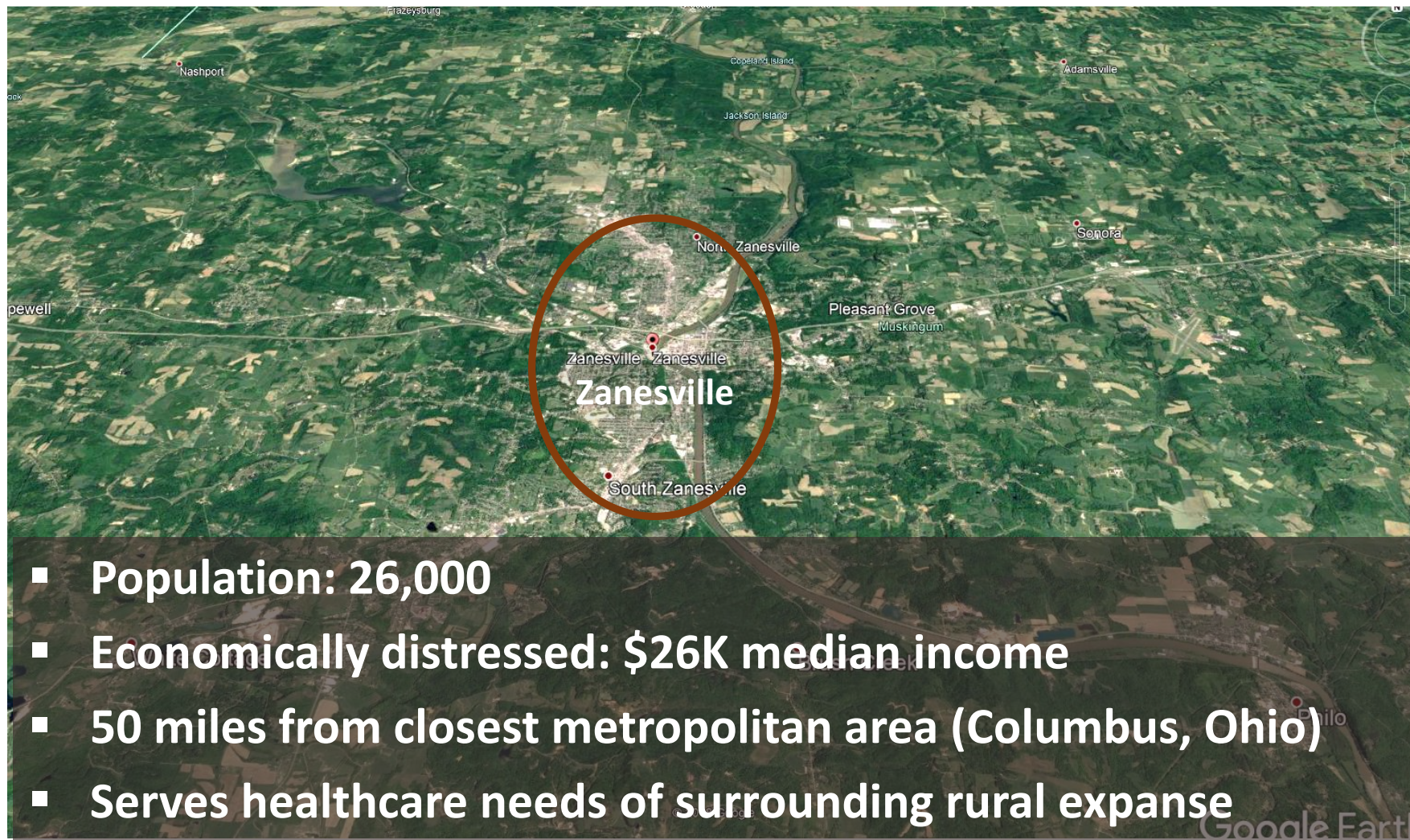
740-590-0076



Upper Arlington, Ohio



Zanesville, Ohio



- **Population: 26,000**
- **Economically distressed: \$26K median income**
- **50 miles from closest metropolitan area (Columbus, Ohio)**
- **Serves healthcare needs of surrounding rural expanse**



Lack of Differentiation

Under Existing and Proposed FCC Definitions of Rurality

- **No differentiation** between these two towns of very different circumstances
- Both designated as **“urban”**

Impact Counter to Intent of Program

- Rural sites in towns such as Zanesville, for which program is intended, **put in lowest priority “urban” classification** due to population of “urban cluster” being slightly greater than 25,000
- Many small towns serving large rural areas would be impacted because the 25,000 population threshold is too low
- Would have a significant negative impact



Switch to Metropolitan and Micropolitan Core Based Statistical Areas

US Census Bureau in 2003 defined Metropolitan and Micropolitan Statistical Areas are collectively referred to as Core-Based Statistical Areas.

<https://www.census.gov/topics/housing/housing-patterns/about/core-based-statistical-areas.html>

- **Metropolitan** statistical areas have at least one urbanized area of 50,000 or more population, plus adjacent territory that has a high degree of social and economic integration with the core as measured by commuting ties.
- **Micropolitan** statistical areas have at least one urban cluster of at least 10,000 but less than 50,000 population, plus adjacent territory that has a high degree of social and economic integration with the core as measured by commuting ties.

Switching to these Census Bureau definitions would solve the rurality definition issues, slotting small towns as “less rural” rather than “urban.”



Suggested Modification to Proposed HCF Definitions

- *Extremely rural* – counties entirely outside of a Core Based Statistical Area;
- *Rural* – census blocks within a Micropolitan Statistical Area but the census block does not contain any part of an urban area or cluster;
- *Less Rural* – census blocks within a Micropolitan Statistical Area, plus census blocks within a Metropolitan Statistical Area but the census block does not contain any part of an urban area or cluster; and
- *Urban* – all other non-rural areas.”

Results in Example: Upper Arlington = Urban
Zanesville = Less Rural

Note: Suggested change to census blocks from census tracts explained in next slide



Rural Census Blocks as Unit of Measure Instead of Tracts

- Propose using census blocks rather than tracts for defining HCF rurality designations
- Avoids disqualification of very large geographic areas due to a slight overlap with a small town in an otherwise rural area
- Census blocks a better unit of measure due to relative sizes of blocks in rural vs urban areas
 - As small as 0.7 acres, no maximum size
 - Cities = 2 acres on average
 - Small town = 6 acres on average
 - Southeastern Ohio rural expanse = **250 to 3,500 acres** (750 in illustration)
 - **Rural census blocks 40 to 1,500 times the size** of census blocks in cities and towns

